

**WESTERMAN BALL EDERER
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By ECF

Magistrate Judge Valerie Figueredo
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 17A
New York, NY 10007

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 6-27-2023

The conference scheduled for June 29, 2023 is hereby adjourned to **Thursday, July 20, 2023 at 2:30 p.m.** Counsel for the parties are directed to call Judge Figueredo's AT&T conference line at the scheduled time. **Please dial (888) 808-6929; access code 9781335.** The Clerk of Court is directed to terminate the motion at ECF No. 188. **SO ORDERED.**

Re: *Wilmington Trust, National Association, as Trustee, etc. v.*
Winta Asset Management LLC and Shuigun Chen
Case No.: 1:20-cv-05309-JGK-VF

Dear Magistrate Judge Figueredo:

Our firm was recently retained to represent defendant Shuigun Chen in this case.¹ We write with respect to the upcoming conference on plaintiff's Motion for Judgment of Foreclosure, which is scheduled for June 29, 2023 at 10:30 a.m. We are in the process of getting up to speed on this case and have discovered that there is quite a bit of history and material to digest. Among the matters that we are reviewing is plaintiff's Motion for Judgment of Foreclosure (ECF No. 147) and related documents. This motion potentially impacts our client (who is alleged to have some liability as a guarantor) and we would like the opportunity to participate in the conference on behalf of Mr. Chen after we have had a chance to more fully review the relevant information and issues.

We respectfully request an adjournment of the conference as newly retained counsel so that we are in the best position to represent our new client on the important issues presently before the Court. No prior request for such extension has been made. We contacted counsel for the other parties to see if they consent to the requested adjournment. Co-defendant, borrower Winta Asset Management LLC, has consented to the request. Plaintiff has not, citing to the motion having been fully briefed. Notwithstanding plaintiff's refusal to consent, we nevertheless request an opportunity to prepare to participate in the conference since we were only retained by Mr. Chen on June 14, 2023.

In consultation with co-defendant's counsel, we propose the following dates/times for an adjourned date: after 2:00 p.m. on July 20, July 21, July 24 or July 25. We respectfully request that the Court adjourn the conference to one of the proposed dates, or such other time as may please the Court.

Your Honor's courtesy and attention to this matter are greatly appreciated.

¹ We were retained on June 14, 2023 and filed a notice of appearance that afternoon.

Respectfully submitted,

Jeffrey A. Miller
Jeffrey Miller

cc: All parties of record via ECF